

LAW OFFICE OF
Jacob Barclay Mitchell, Esq.
225 Broadway, Suite 2815
New York, New York 10007

TELEPHONE: (212) 204-2574

E-MAIL: jacobbarclaymitchell@gmail.com

March 6, 2022

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: *United States v. Constantinescu et al., No. 19 Cr. 651*

Dear Judge Swain:

On behalf of defendants Ionela Constantinescu, Christian Costea, and Iuliana Mihailescu we write to request a sixty-day adjournment of the upcoming status conference. We have conferred with the government who join in this request.

The parties do not currently have any issues to raise with the Court. We are reviewing the discovery produced by the Government and exploring with our clients and the Government the possibility of pre-trial dispositions. Should the Court grant this request, we have no objection to an exclusion of time under the Speedy Trial Act through the re-scheduled date.

Respectfully Submitted,

[Signatures on following page]

The foregoing adjournment request is granted. The pretrial conference is hereby rescheduled for May 23, 2022, at 2:30p.m. Speedy trial time has been excluded in this action through June 20, 2022.

SO ORDERED.

3/7/2022

/s/ Laura Taylor Swain, Chief USDJ

/s Jacob Mitchell

Ezra Spilke
Jacob Barclay Mitchell, Of Counsel
11825 Foster Avenue Suite 1K
Brooklyn, NY 11230
(718) 783-3682
Ezra@spilkelaw.com
Counsel for Ionela Constantinescu

/s Jake Lasala

125-10 Queens Boulevard - Suite 320
Kew Gardens, NY 11415
(718) 261-7695
Email: jlasalaesq@aol.com
Counsel for Cristian Costea

/s Dawn Marcella Cardi

Cardi & Edgar LLP
99 Madison Avenue, 8th Floor New York, NY 10016
(212) 481-7770
Email: DCardi@CardiEdgarLaw.com
Counsel for Iuliana Mihailescu

cc: All counsel of record by ECF